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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

ESTATE OF RAFAEL RAMIREZ LARA, deceased,  
by and through PATRICIA RAMIREZ; PATRICIA  
RAMIREZ; RAFAEL RAMIREZ; and JENNIFER  
RAMIREZ,

Plaintiffs,

v.

COUNTY OF MONTEREY; SHERIFF STEVE  
BERNAL, in his individual and official capacity;  
JAMES BASS, in his individual and official  
capacity; JOHNATHAN THORNBURG, in his  
individual and official capacity; RAY TONGOL, in  
his individual and official capacity; J. TEJEDA;  
WELLPATH; KIP HALLMAN; JORGE  
DOMINICIS; THOMAS PANGBURN; PAUL  
FRANCISCO; RAYMOND HERR and CHRISTINA  
KAUPP,

Defendants.

Case No.: 4:21-cv-02409-PJH

**JOINT STIPULATION FOR DISMISSAL  
OF ENTIRE CASE WITH PREJUDICE;  
ORDER**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs ESTATE OF RAFAEL RAMIREZ LARA, deceased, by and through PATRICIA RAMIREZ; PATRICIA RAMIREZ; RAFAEL RAMIREZ; and JENNIFER RAMIREZ, and Defendant WELLPATH, hereby stipulate to the voluntary dismissal of Plaintiffs' claims against Defendant Wellpath with prejudice. This dismissal resolves the entire action. Except as provided in the settlement agreements executed between Plaintiffs and Defendants, each Party is to bear its own costs, attorney's fees, and expenses and waives any claim for such costs, fees, and expenses. The Parties further recognize that, pursuant to the Court's October 5, 2022 Order, ECF 101, the Court retains jurisdiction to enforce the settlement agreements reached in this matter.

Respectfully Submitted,

Dated: January 19, 2023

RIFKIN LAW OFFICE

By: /s/ Lori Rifkin

Lori Rifkin

Attorney for Plaintiffs

Dated: January 19, 2023

BERTLING LAW GROUP

By: /s/ Jemma Parker Saunders

Peter G. Bertling

Jemma Parker Saunders

Attorneys for WELLPATH Defendants

**ORDER**

The Court, having considered the Parties' above joint notice and good cause appearing,  
ORDERS as follows:

Plaintiffs' claims against Defendant Wellpath are dismissed with prejudice. This resolves  
the entire action. Pursuant to the Court's October 5, 2022 Order, ECF 101, the Court retains  
jurisdiction to enforce the settlement agreements reached in this matter.

**IT IS SO ORDERED.**

Dated: 1/20/2023

  
PHYLLIS J. HAMILTON  
United States District Judge